

From: [Schindler, Jason](#)
To: [Haklar, James](#); ["Anthony Findley"](#); [Mark Fisher](#); [Ramin Ansari \(Ramin.Ansari@chemtura.com\)](#); [Martin, Ana \(Ana.Martin@chemtura.com\)](#); ["Etela, Kirstin - Middlebury, CT"](#); [kaiello@mcua.com](#); [Venkat Puranapanda \(Venkat.puranapanda@chubb.com\)](#); [steven.piatkowski@chubb.com](#); [Stella, Christopher R \(Christopher.Stella@Chubb.com\)](#); [Anthony, Scott R \(Scott.Anthony@Chubb.com\)](#)
Cc: [Jones, Sally](#); [Peachey, Bryan](#); [Blarr, Steve](#); [Devorak, Coleen](#)
Subject: Hatco quarterly progress report 46
Date: Tuesday, April 04, 2017 4:43:40 PM
Attachments: [2017-04-04 Weston EPA-Progress Rpt 46.pdf](#)

All,

A copy of the Hatco quarterly progress report is attached for your information. Let me know if you need a hard copy.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837

Tel: 732-417-5804

Cell: 732-740-5529

Fax: 732-417-5801

www.westonsolutions.com

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.



WESTON SOLUTIONS, INC.
205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
732-417-5800 • FAX: 732-417-5801

VIA FEDEX

April 4, 2017

Ms. Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 46, which covers the activities associated with the Hatco Site from December 1, 2016 through February 28, 2017. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

Jason Schindler
Principal Project Manager

cc: A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, A. Martin, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, S. Anthony (Chubb)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 46
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: December 1, 2016 through February 28, 2017
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report No. 45 on January 4, 2017.
 - 5.2 Weston provided monthly email updates to the United States Environmental Protection Agency (USEPA) on January 5 and March 7, 2017.
 - 5.3 In November 2016, Weston revised the recovery program to accommodate the combustible gases encountered in 36 existing recovery wells. Current recovery work employs level C personnel protective equipment, a dedicated fire watch and hot work permits to comply with facility requirements, and bonding and grounding for certain of the light non-aqueous phase liquid (LNAPL) recovery operations. Recovery resumed on December 7, 8 and 9 using manual recovery methods. This included use of bailers, sorbent material and a peristaltic pump at existing monitoring wells and recovery wells that are not equipped with dedicated pumps. A total of 39.7 gallons of LNAPL was recovered. On January 11 and 12, 2017, Weston recovered 26.2 gallons of LNAPL. Automated recovery operations using the dedicated pumps are scheduled to resume in March/April.
 - 5.4 Remediation of the Northeast Impoundment (NEI) remediation is complete. During the remediation, erosion was observed along the bank of Slingtail Creek. While this erosion was unrelated to the remediation activities, a limited area along the northeast corner of the engineered cap will require additional erosion protection to prevent future erosion from undermining the cap. Weston met with the New Jersey Department of Environmental Protection (NJDEP) for a pre-application submittal review on December 20, 2016. Weston finalized the required permit applications in February for submittal on March 2, 2017. Pending regulatory approval Weston plans to construct the streambank protection as part of the site-wide capping.
 - 5.5 On February 21, 2017, Weston and the Licensed Site Remediation Professional (LSRP) met with USEPA and NJDEP to review responses to NJDEP's ecological component review of the remedial investigation report. Weston and the LSRP have prepared a memorandum that documented the meeting for submittal in March.
 - 5.6 The annual wetland monitoring report was completed and submitted to NJDEP on December 7, 2016. During this monitoring period a portion of the restored wetlands was cleared by Middlesex Water Company, as part of their utility maintenance

program. Weston contacted Ms. JoDale Legg at NJDEP and documented this condition in the report.

- 5.7 On January 24, 2017, Tim Thomas of the Freehold Soil Conservation District (FSCD) completed an inspection of the erosion controls and restoration at the site. Mr. Thomas inspected the NEI, Scrape Area X119 and the Former Lagoon Area. Mr. Thomas stated that FSCD is satisfied with stabilization and agreed that Weston may remove the remaining silt fence from the three areas and continue to maintain the SoilTac and berm surrounding the Former Lagoon Area.
- 5.8 On January 31, 2017, James Haklar of the USEPA completed an inspection of the Hatco operations. The inspection included the waste storage area and nearby satellite LNAPL recovery area, and the completed Southeast Leg, Scrape Area X119 and Northeast Impoundment remediation areas. Dr. Haklar requested Weston post additional polychlorinated biphenyl (PCB) notification signs in the primary and satellite recovery areas and requested information regarding the SoilTac material used to stabilize the Former Lagoon Area. Additional signs were obtained and posted on February 17, 2017. Weston provided information on the SoilTac by email transmittal on March 8, 2017.
- 5.9 On February 1, 2017, Chemtura issued a public announcement of a planned merger with Lanxess AG. Weston provided notice of the transaction to USEPA by letter dated February 6, 2017, in accordance with the Risk-Based PCB Disposal approval letter.
- 5.10 By letter dated February 17, 2017, NJDEP confirmed that the project is in compliance with applicable Hazardous Waste Program regulations and permit conditions. This letter pertained to the NJDEP inspection of Weston's Hatco hazardous waste recovery and storage operations on December 13, 2016.

6. Specific Requirements Previously Initiated Which are Continuing:

- 6.1 As noted above, LNAPL recovery operations were temporarily halted. LNAPL at the site is contained by the cut-off wall and recovery trenches; the mobile LNAPL downgradient of the containment was fully removed during the Southeast Leg remedial action. Manual recovery operations resumed in December. Total recovery to date:
 - 8,718 gallons recovered using skimmers and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the SE Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the SE Leg remediation.
- 6.2 Weston continued development of Remedial Action Work Plan (RAWP) Addendum 4 for Woodbridge Pond. Weston prepared the conceptual remediation plan for Woodbridge Pond and obtained approval from the property owner, Woodbridge Township. The plan was finalized in February for submittal to USEPA, the Licensed Site Remediation Professional (LSRP) and NJDEP on March 1. Following regulatory review and comments on the conceptual remediation plan Weston will finalize Remedial Action Work Plan Addendum 4 and complete the required permit applications to implement the remedial action.
- 6.3 Preparation of draft remediation report documentation for LSRP review and approval and monthly progress meetings with the LSRP.

- 6.4 Evaluation of conceptual remediation approaches for Channel D, incorporating responses to NJDEP comments on sediment delineation. As noted above, the LSRP and Weston met with NJDEP to review comments on the ecological components of the Remedial Investigation Report. As discussed during the Technical Consultation meeting, Weston is currently preparing a sediment sampling plan to investigate the horizontal and vertical extent of the bis(2-ethylhexyl)phthalate in sediment at sample location CDG_382.
 - 6.5 The Southeast Leg Remediation was completed. Construction of the cut-off wall was completed during the Southeast Leg remediation work; no mobile LNAPL remains downgradient of the cut-off wall. Final wetland restoration was completed on December 1, 2016 and documented in the annual monitoring report dated December 1, 2016. Weston is currently preparing a Remedial Action Progress Report to document the work completed.
 - 6.6 In July, Weston completed the application of a temporary stabilizing agent (Soiltac) on the Former Lagoon Area to extend the functional lifespan of the temporary cover until final capping can be implemented. Weston is conducting monthly inspections to verify that the temporary cover is functioning properly. Minor erosion was noted during the inspection in November and repairs were completed on December 2, 2016. Weston is currently preparing the final cap design for USEPA for review.
 - 6.7 Weston is currently preparing an engineering plan for the onsite capping of remaining contaminated soil and permanent capping of the Former Lagoon Area. Weston will document the existing conditions and provide a detailed plan to complete the onsite cap construction for regulatory review and approval.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 Preparation of RAWP Addendum 4
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 Completion of the RAWP Addendum 4 was postponed pending approval of the remediation approach by the Woodbridge Pond property owner and USEPA. Weston received approval by the property owner and the LSRP. Weston received verbal comments from USEPA and provided a response in March. Upon USEPA's acceptance of Weston's response we will proceed with preparation of RAWP Addendum 4 and the required permit applications.
9. Specific Requirements to be Initiated in Next Reporting Period (March - May 2017):
 - 9.1 Prepare RAWP Addendum 4 for Woodbridge Pond remediation, pending USEPA approval of the technical approach.
 - 9.2 Update scope and schedule for Woodbridge Pond and Channel D remediation.
 - 9.3 Resume automated LNAPL recovery operations.
 - 9.4 Complete Southeast Leg Remedial Action Progress Report.
 - 9.5 Continue preparation of NEI Remedial Action Progress Report.
 - 9.6 Prepare engineering plan for site-wide capping of remaining contaminated soil and permanent capping of the Former Lagoon Area.



- 9.7 Submit permit applications for streambank armoring to protect the engineered cap at the NEI (completed on March 2, 2017).
- 9.8 Prepare sampling plan to delineate bis(2-ethylhexyl)phthalate in sediment near sample location CDG_382.
- 9.9 Finalize memorandum documenting discussions during the Technical Consultation meeting on February 21, 2017 (completed on March 13, 2017).
- 9.10 Provide provided information on the SoilTac (completed on March 8, 2017).
- 9.11 Complete design for capping of the Former Lagoon Area.

L:\13067 Hatco\2.0 Communications\2.5 Communications Regulatory\2.5.1 - USEPA\2.5.1.5 - USEPA Progress Reports\USEPA Prog Rpt 46 2017-04\2017-04-05
Weston EPA-Progress Rpt 46.docx